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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 CHRISTOPHER A. NELSON, individually and
on behalf of all others similarly situated,

No. 5:16-cv-00523-RMW

18 Plaintiff,

19 v.

20 SEAGATE TECHNOLOGY LLC,

21 Defendant.

DECLARATION OF JEFF D. FRIEDMAN
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED PURSUANT TO CIVIL
LOCAL RULES
3-12 AND 7-11

23 THIS DOCUMENT RELATES TO:

24 *Ginsberg v. Seagate Technology LLC*, Case No.
5:16-cv-00612-LHK

1 I, Jeff D. Friedman, declare as follows:

2 1. I am an attorney duly admitted to practice before this Court. I am a partner with the
3 law firm of Hagens Berman Sobol Shapiro LLP (Hagens Berman), attorneys of record for plaintiffs
4 Adam Ginsberg, Dudley Lane Dortch IV, Dennis Crawford, and David Schechner (Plaintiffs) in the
5 case *Ginsberg, et al. v. Seagate Technology*, Civil No. 5:16-cv-00612.

6 2. I am one of the attorneys responsible for handling this matter, along with the other
7 attorneys identified on the *Ginsberg* complaint. If called as a witness, I could and would
8 competently testify to the matters stated herein.

9 3. Pursuant to Civil Local Rules 3-12 and 7-11, I submit this declaration in support of
10 Plaintiffs' Administrative Motion to Consider Whether Cases Should be Related Pursuant to Civil
11 Local Rules 3-12 and 7-11.

12 4. My firm, along with our co-counsel Sheller PC, filed the *Ginsberg* action on
13 February 5, 2016. It is currently assigned to the Honorable Lucy H. Koh.

14 5. Attached hereto as Exhibit A is a copy of the *Ginsberg* complaint.

15 6. Plaintiffs' counsel believe that the *Ginsberg* case is related to the above-captioned
16 *Nelson* case, as both cases assert identical claims and involves nearly identical issues of fact and law.
17

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20 Executed on February 10, 2016 at Berkeley, California.

21
22 _____ /s/ Jeff. D. Friedman _____
23 JEFF D. FRIEDMAN
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